

# **EXHIBIT A**

## **Proposed Order**

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re:

MOBITV, INC.,

Debtor.

Chapter 11

Case No. 21-10457

In re:

MOBITV SERVICE CORPORATION,

Debtor.

Chapter 11

Case No. 21-10458

**ORDER DIRECTING JOINT ADMINISTRATION OF CHAPTER 11 CASES**

Upon the motion (the “Motion”)<sup>1</sup> of the above-captioned debtors (together, the “Debtors”) for entry of an order (this “Order”) directing the Debtors’ chapter 11 cases to be jointly administered for procedural purposes only and granting related relief; and due and sufficient notice of the Motion having been provided under the particular circumstances, and it appearing that no other or further notice need be provided; and the Court having jurisdiction to consider the Motion and the relief requested therein in accordance with 28 U.S.C. §§ 157 and 1334; and consideration of the Motion and the relief requested therein being a core proceeding under 28 U.S.C. § 157(b)(2); and this Court’s entry of a final order being consistent with Article III of the United States Constitution; and venue being proper before this Court under 28 U.S.C. §§ 1408 and 1409; and a hearing having been held to consider the relief requested in the Motion (the “Hearing”); and upon the First Day Declaration and the record of the Hearing and all the proceedings had before the Court; and the Court having found and determined the relief requested in the Motion to be in the best interests of the Debtors, their estates and creditors, and

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<sup>1</sup> A capitalized term used but not defined herein shall have the meaning ascribed to it in the Motion.

any parties in interest; and the legal and factual bases set forth in the Motion and at the Hearing having established just cause for the relief granted herein; and after due deliberation thereon and sufficient cause appearing therefor,

**IT IS HEREBY ORDERED THAT:**

1. The Motion is GRANTED as set forth herein.
2. Each of the above-captioned chapter 11 cases of the Debtors are consolidated for procedural purposes only and shall be jointly administered by the Court under Case No. 21-10457.
3. Nothing contained in the Motion or this Order is to be deemed or construed as directing or otherwise effecting a substantive consolidation of these chapter 11 cases, and this Order shall be without prejudice to the rights of the Debtors to seek entry of an order substantively consolidating their respective cases.
4. The caption of the jointly administered cases shall read as follows:

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re:

MOBITV, INC., *et al.*,<sup>1</sup>

Debtors.

Chapter 11

Case No. 21- 10457

Jointly Administered

5. All pleadings and notices shall be captioned as indicated in the preceding decretal paragraph including a listing the Debtors in these chapter 11 cases and the last four

numbers of their tax identification numbers along with the address of the Debtors' corporate headquarters only and all original docket entries shall be made in the case of MobiTV, Inc., Case No. 21-10457.

6. A docket entry shall be made in each of the Debtors' cases substantially similar to the following:

An order has been entered in this case consolidating this case with the case of MobiTV Service Corporation (Case No. 21-10458) for procedural purposes only and providing for its joint administration in accordance with the terms thereof. The docket in Case No. 21-10457 should be consulted for all matters affecting this case.

7. The terms and conditions of this Order are immediately effective and enforceable upon its entry.

8. The Debtors are authorized and empowered to take all actions necessary or appropriate to implement the relief granted in this Order.

9. This Court retains jurisdiction over all matters arising from or related to the implementation or interpretation of this Order.